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OFFICE OF THE SECRETARY

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WRITER'S DIRECT DIAL NUMBER

November 10, 1998

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Federal Communications Commission  
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Washington, D.C. 20554

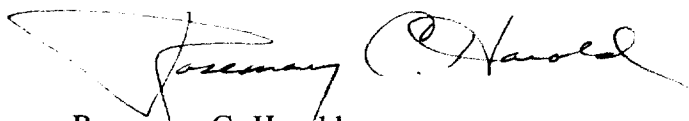
Re: COMSAT Corporation  
Direct Access to the INTELSAT System  
(IB Docket No. 98-192; File No. 60-SAT-ISP-97)  
Request for Extension of Time

Dear Ms. Salas:

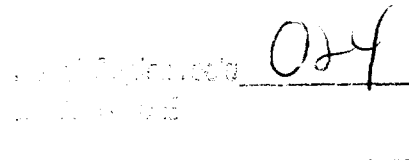
By its undersigned attorney, COMSAT Corporation ("COMSAT") hereby submits the enclosed request for extension of the comment and reply comment deadlines in the above-referenced proceeding. In accordance with Sections 1.46 and 1.419 of the Commission's rules, this submission consists of the original version of the request and four complete copies. Also, at the request of the International Bureau, copies of the request are being served on parties of record in File No. 60-SAT-ISP-97 and an additional party who has expressed interest in IB Docket No. 98-192.

Please date-stamp the attached duplicate upon receipt and return it via the messenger for our records. If any questions arise concerning this matter, kindly contact the undersigned.

Respectfully submitted,

  
Rosemary C. Harold

Enclosures  
cc: James Ball, IB

  
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	IB Docket No. 98-192
Direct Access to the	)	File No. 60-SAT-ISP-97
INTELSAT System	)	

To: The Commission

**REQUEST OF COMSAT CORPORATION  
FOR EXTENSION OF TIME**

Pursuant to Sections 1.46 and 1.419 of the Commission's rules, COMSAT Corporation ("COMSAT") hereby respectfully requests that the agency grant an extension of time to all parties interested in filing comments and reply comments in the above-referenced proceeding.<sup>1</sup> The Commission has called for comment on the issue of whether to grant "U.S. carriers and users direct access to the International Telecommunications Satellite Organization (INTELSAT) satellite system for the purpose of providing international communications services."<sup>2</sup> The current deadline established for initial comments is Friday, December 18, 1998, and reply comments are due Friday, January 8, 1999.<sup>3</sup>

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<sup>1</sup> *Direct Access to the INTELSAT System* (Notice of Proposed Rulemaking), IB Docket No. 98-192, FCC 98-280 (rel. Oct. 28, 1998) ("Notice").

<sup>2</sup> *Notice* at ¶ 1 (citing *Petition of COMSAT Corporation for Forbearance from Dominant Carrier Regulation and for Reclassification as a Non-Dominant Carrier*, File No. 60-SAT-ISP-97, FCC 98-78 (rel. Apr. 28, 1998)).

<sup>3</sup> A discrepancy appears in the text of the *Notice* concerning the deadline for first-round comments. *See Notice* at ¶ 62 (indicating that initial comments are due December 15, 1998).

The *Notice* raises complex issues that will require some additional time, and the participation of several key COMSAT personnel, to properly address. Many of these persons also will be closely involved in responding to the comments and/or oppositions that COMSAT expects will be filed in connection with the proposed transfer of control of COMSAT to Lockheed Martin Corporation.<sup>4</sup> As the Commission's docketing record reflects, the deadlines for initial comments, oppositions, and replies in that proceeding fall between November 23 and December 18, 1998. This tight schedule will make it extremely difficult for COMSAT to help provide the Commission with the fully developed factual record and legal arguments that both proceedings require. Therefore, a short extension of the deadline for initial comments in this proceeding to December 22, 1998, is warranted.

Moreover, the intervening year-end holiday period poses additional obstacles with respect to the reply deadline. Several persons integral to COMSAT's reply comments will be out of town and/or otherwise unavailable between December 24, 1998, and January 4, 1999, the first regular work day following the holiday period. COMSAT anticipates that several interested parties will file substantial comments in the first round of the proceeding that will require significant time and coordination to address, thus justifying a longer reply period. COMSAT also is concerned that the holiday break will make it more difficult to obtain and distribute copies of all the initial comments in a timely fashion—and thereby create an additional hindrance to its ability to formulate considered responses to arguments raised in the first round of the proceeding. A somewhat lengthier but still reasonable extension of the reply deadline to January 29, 1998,

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<sup>4</sup> *Joint Application of Lockheed Martin Corporation, et al., and COMSAT Corporation, et al., for Transfer of Control of COMSAT Corporation*, FCC File No. SAT-ISP-19981016-00072.

will afford COMSAT and other interested parties with the time needed to properly review and address the initial comments of all participants.

Given these circumstances, COMSAT requests that the Commission extend the deadline for the filing of initial comments by all parties interested in this proceeding to Tuesday, December 22, 1998, and extend the reply deadline for all parties to Friday, January 29, 1998. As indicated on the attached Certificate of Service, COMSAT is supplying parties of record in the Non-Dominance proceeding, along with another party that has expressed interest in this proceeding, with a copy of this request.

Respectfully submitted,

COMSAT Corporation

By: 

Lawrence W. Secrest, III

Rosemary C. Harold

WILEY, REIN & FIELDING

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Washington, D.C. 20006

(202) 429-7000

November 10, 1998

*Counsel for COMSAT Corporation*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Request of COMSAT Corporation was sent via first-class mail this 10th day of November, 1998, to each of the following:

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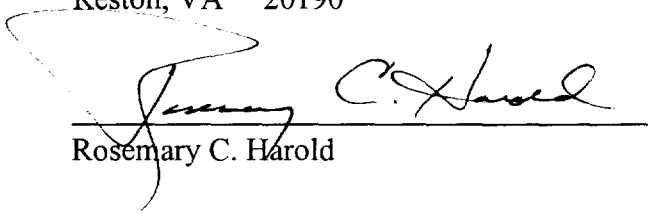
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